

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 1/14/2014, 1/15/2014, 1/16/2014, 1/17/2014	Man Days: 4
Inspection Unit: Pawnee TRANSMISSION	
Location of Audit: Pawnee	
Exit Meeting Contact: Dallas Jett	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Charles Gribbins,	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Dallas Jett	Superintendent of Quality Assurance	
Mike Fuller	Engineer, Gas Compliance and Training	

Gas System Operations	Status
Gas Transporter	Various Gas Transporters
Miles of Main	1250
Confirm Operator's Potential Impact Radius Calculations	Not Checked
<u>General Comment:</u>	
<i>The potential impact radius calculations will be reviewed at Decatur Plaza</i>	
Annual Report (Form 7100.2.1) reviewed for the year:	2013
Regulatory Reporting Records	Status
[191.5] Were Telephonic Notices of Incidents reported to the NRC	Not Applicable

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	(800-424-8802)?	
<u>General Comment:</u> <i>No reportable incidents occurred on the transmission system in 2013.</i>		
[191.15(a)]	Was a DOT Incident Report Form F7100.2 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u> <i>No written incident reports were required in 2013 for transmission.</i>		
[191.15(b)]	Were there any supplemental incident reports when deemed necessary?	Not Applicable
<u>General Comment:</u> <i>No supplemental incident reports were required due to no reportable incidents occurring on Ameren's transmission facilities.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u> <i>No Safety Related Conditions occurred on the transmission system that required reporting in 2013.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u> <i>No Safety Related Condition reports were required in 2013.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each customer after the customer first receives gas at a particular location?	Satisfactory
<u>General Comment:</u> <i>Upon signing up for gas service the operator's corporate communications department sends a Natural Gas Safety pamphlet with the first customer bill. Staff reviewed documents provided by the operator to confirm that new customers were being notified of buried fuel lines on their property.</i>		
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>The Drug and Alcohol plan was not reviewed during this audit. The plan and records was reviewed in 2012 at the St. Louis Headquarters.</i>		
TEST REQUIREMENTS		Status
<u>Category Comment:</u> <i>Test Records to be reviewed at Decatur Plaza Office.</i>		
[192.517(a)][192.505,192.507,192.509,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Checked

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[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Not Checked
UPRATING		Status
Category Comment: <i>Up-rating records to be reviewed at the Decatur Plaza Office.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Checked
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Checked
OPERATIONS		Status
Category Comment: <i>Abnormal operating Conditions to be reviewed at the Springfield's Gas Control inspection.</i>		
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
General Comment: <i>The Ameren O&M was not reviewed as part of this audit, Staff will review the O&M at the Ameren Pawnee Training Center at a later time.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
General Comment: <i>The Operator Qualification plan was not reviewed as part of this audit. The OQ plan will be reviewed at the Ameren Training Center at a later time.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Not Checked
General Comment: <i>Construction records are available through Ameren Gas Engineering or from the local service area headquarters. Maps are maintained in the mapping software being utilized such as Beyers, Frame and a new system is now being activated and is GIS based. Ameren's Gas engineering performs the system design for work being completed on piping operating at or above 100 psig. These records will be reviewed at the Decatur Plaza Office.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Not Checked
General Comment: <i>This was not reviewed during this audit it will be reviewed during the record audit to be performed at a later time, at the Ameren Training Center located near Pawnee, Illinois.</i>		
[192.603(b)][192.605(c)(1)(i)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns?	Not Checked
[192.603(b)][192.605(c)(1)(ii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of increase or	Not Checked

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	decrease in pressure or flow rate outside normal operating limits?	
[192.603(b)][192.605(c)(1)(iii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of loss of communications?	Not Checked
[192.603(b)][192.605(c)(1)(iv)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of operation of any safety device?	Not Checked
[192.603(b)][192.605(c)(1)(v)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property?	Not Checked
[192.603(b)][192.605(c)(2)]	Does the operator maintain documentation of checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	Not Checked
[192.603(b)][192.605(c)(3)]	Does the operator maintain documentation of notifying responsible operator personnel when notice of an abnormal operation is received?	Not Checked
[192.603(b)][192.605(c)(4)]	Does the operator maintain documentation for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found?	Not Checked
[192.603(b)][192.619,192.621,192.623]	Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Not Checked
CONTINUING SURVEILLANCE RECORDS		Status
<u>Category Comment:</u> <i>These record to be reviewed at the Decatur Plaza Office.</i>		
[192.709(c)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Not Checked
CLASS LOCATION CHANGE		Status
<u>Category Comment:</u> <i>These record to be reviewed at the Decatur Plaza Office.</i>		
[192.709(c)][192.609]	Does the operator maintain documentation when the class location changes for a segment of pipe operating at a hoop stress that is more than 40% SMYS?	Not Checked
QUALIFICATION OF PIPELINE PERSONNEL		Status

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Refer to operator Qualification Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>The operator qualification plan was not reviewed as part of this audit. It will be reviewed during the record audit performed at the Ameren Training Center located near Pawnee, Illinois at a later time.</i>		
DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u> <i>The Damage Prevention requirements will be reviewed during the record audit performed at the Ameren Training Center at a later time.</i>		
[192.709(c)][191.17(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.709(c)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Checked
[192.709(c)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Checked
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>Staff determined the emergency plans are being maintained at the storage field locations. Staff will review the emergency plan during the onsite inspections to ensure they are a current version of the emergency plan. Storage Supervisors are provided a current copy of the emergency plan. For the engineering group located at the Decatur Plaza headquarters and the local service areas, an electronic copy of the emergency plan is available on the Ameren Intranet. Staff will verify that emergency plans are reviewed at the storage facilities when these audits are conducted.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Not Checked
<u>General Comment:</u>		

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<i>Emergency Plan training was not reviewed during this audit this documentation is reviewed during the local inspections site audits such as storage fields and local service areas that maintain transmission facilities.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u> <i>Ameren reviews the actions taken by their personnel to establish they took the necessary actions to and followed the established procedures.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Not Checked
<u>General Comment:</u> <i>This documentation is reviewed during the public awareness program audit and was not checked during this audit.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Checked
<u>General Comment:</u> <i>This documentation is reviewed during the local service areas who respond to leak complaints received on distribution and transmission facilities in their service areas. Staff reviews the response times, investigations and the actions taken by storage personnel when responding to notifications of leaks and issues reported at storage fields. These records maintained at the storage field and are reviewed when conducting the record audits at the Ameren storage fields.</i>		
[192.603(b)][192.615(a)(11)]	Has the operator maintained documentation of actions that were required to be taken by a controller during and emergency?	Not Checked
<u>General Comment:</u> <i>This documentation is reviewed during the storage field inspections and the Gas Control record audit and was not reviewed during this audit.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>The Public Awareness Plan and records were not reviewed during this audit. The Public Awareness Plan will be reviewed during the record Audit performed at the Ameren Training Center located near Pawnee, Illinois at a later date.</i>		
ODORIZATION OF GAS		Status
<u>Category Comment:</u> <i>This documentation is reviewed during the Ameren local service center inspections and storage field inspections due to the odorometer testing being performed by their personnel.</i>		
[192.709(c)][192.625(f)]	Where required, has the operator maintained documentation of odorant concentration level testing?	Not Checked
[192.709(c)][192.625(e)]	Where required, has the operator maintained documentation of odorizer tank levels?	Not Checked

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PATROLLING & LEAKAGE SURVEY		Status
[192.709(c)][192.705]	Does the operator maintain documentation of a patrol program as required?	Satisfactory
<p>General Comment:</p> <p>Staff reviewed the Gas Compliance records for transmission lines patrolling in the Gas Compliance System. No issues were identified during the review. The following areas were reviewed IP, CILCO, and CIPS</p>		
[192.709(c)][192.706]	Does the operator maintain documentation of leakage survey(s) performed on a transmission pipeline?	Satisfactory
<p>General Comment:</p> <p>Staff reviewed leak survey conducted for 2013, Staff did not encounter any issues at the time of inspection.</p> <p>Ameren Illinois is looking at the old CIPS territories and making some class location changes and reclassifying transmission pipeline as class III locations. They assigned new leak survey numbers and associating the new inspection with the old leak survey number for the correct leak survey cycles.</p>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<p>Category Comment:</p> <p>These records to be reviewed at the Decatur Plaza office.</p>		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Checked
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Checked
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Checked
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Checked
COMPRESSOR STATION		Status
<p>Category Comment:</p> <p>Compressor Station requirements were not reviewed during this audit because there are no compressors utilized directly on the transmission system. The compressors owned and operated by Ameren are located and operated in conjunction with their storage operations. The records associated with the compressors are reviewed during the individual storage field audits.</p>		
[192.709(c)][192.731(a)]	Has the operator maintained documentation of the compressor station relief devices at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.731(c)]	Has the operator maintained documentation compressor station emergency shutdown at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.736(c)]	Has the operator maintained documentation of the	Not Checked

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	compressor stations – detection and alarms?	
PRESSURE LIMITING AND REGULATION		Status
<u>Category Comment:</u>		
<i>Any pressure limiting or regulation devices would need to be checked at Operating Centers and Storage Facilities, Staff has asked the operator to compile a list of stations or regulating devices for the transmission facilities.</i>		
[192.709(c)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Not Checked
[192.709(c)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Checked
[192.709(c)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Checked
VALVE MAINTENANCE		Status
[192.709(c)][192.745(a),192.745(b)]	Did the operator inspect and partially operate transmission valves that might be required during any emergency at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>Staff reviewed valve inspection records and noted that Ameren has been in the process of evaluating emergency valve on the transmission and storage fields and adding new or existing valves to the list of emergency valves, this has increased the number of valves to the inspection list. At this time the records for each branch of Ameren Illinois are kept at separate locations in the their data</i>		
[192.709(c)][192.749]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u>		
<i>In 2013 there were no vaults located in the Ameren Transmission System meeting these requirements.</i>		
Investigation Of Failures		Status
[192.709(c)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
<u>General Comment:</u>		
<i>There were no reported failures that required analysis on transmission system piping.</i>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked

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<u>General Comment:</u>		
<i>Ameren has qualified welding procedures in their construction standards which are part of the O&M.</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Not Checked
<u>General Comment:</u>		
<i>Welder Qualification records to be checked during the Distribution record audit at Pawnee Training Center at a later date.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
<u>General Comment:</u>		
<i>This information will be checked at the Decatur Plaza Office.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
<u>General Comment:</u>		
<i>This information will be checked at the Decatur Plaza Office.</i>		
CORROSION CONTROL RECORDS		Status
<u>Category Comment:</u>		
<i>Corrosions records will be reviewed at Decatur Plaza Office.</i>		
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system	Not Checked
[192.491][192.459]	Has the operator maintained documentation of examination when buried pipe was exposed?	Not Checked
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Not Checked
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Checked
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Checked
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Checked
[192.491][192.465(e)]	Has the operator maintained documentation of	Not Checked

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	unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation including casings?	Not Checked
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Not Checked
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Checked
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Checked
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Checked
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Not Checked
[192.491]	Has the operator maintained documentation of written procedures supported by as-built drawings or other construction records?	Not Checked
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Checked
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Not Checked
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Not Checked
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Checked
TRAINING - 83 IL ADM. CODE 520		Status
<u>Category Comment:</u>		
<i>These records to be reviewed at Pawnee Training Center with the Operator Qualification records review at a later time.</i>		
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked

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[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked